

ORIGINAL

RECEIVED

SEP 17 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Petition of US West Communications, Inc.)
for a Declaratory Ruling Regarding the)
Provision of National Directory Assistance)

CC Docket No. 97-172

DOCKET FILE COPY ORIGINAL

REPLY COMMENTS OF
MCI TELECOMMUNICATIONS CORPORATION

MCI TELECOMMUNICATIONS CORPORATION

R. Dale Dixon, Jr.
Frank W. Krogh
Lisa B. Smith
1801 Pennsylvania Avenue, NW
Washington, D.C. 20006
202-887-2383

Its Attorneys

Date: September 17, 1997

No. of Copies rec'd 024
List ABOVE

Table of Contents

<u>Item</u>	<u>Page</u>
INTRODUCTION AND SUMMARY.....	1
I. The Statutory Definition Arguments.....	2
II. No Prior MFJ Authorization for the BOC Provision of National Directory Assistance.....	7
III. The Commission's <u>N11 Order</u> with Respect to the 411 Access Code.....	9
IV. The Unfair Competitive Advantage of the BOCs' Exclusive Use of 411.....	11
CONCLUSION.....	12

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition of US West Communications, Inc.)	CC Docket No. 97-172
for a Declaratory Ruling Regarding the)	
Provision of National Directory Assistance)	

**REPLY COMMENTS OF
MCI TELECOMMUNICATIONS CORPORATION**

INTRODUCTION AND SUMMARY

The comments filed in response to the Petition of US West Communications, Inc. for a Declaratory Ruling Regarding the Provision of National Directory Assistance (the "Petition") confirm MCI Telecommunications Corporation's ("MCI's") position that National Directory Assistance is an in-region interLATA telecommunications service subject to the restrictions in Sections 271 and 272 of the Communications Act of 1934 (the "Act"), as amended by the Telecommunications Act of 1996 (the "1996 Act"). The Bell Operating Companies' ("BOCs") statutory arguments, and their characterizations of National Directory Assistance service as "adjunct-to-basic," support MCI's point that National Directory Assistance service is properly characterized as an in-region interLATA service offering.

Further, although the BOCs have claimed that National Directory Assistance service is permitted under the Act as a service previously authorized under the MFJ, the BOCs have failed to address the strict limitations the MFJ Court placed on directory assistance in the very order they cite. BOC provision of National Directory Assistance service is not a previously authorized

activity under the MFJ, because the MFJ clearly limited BOC provision of directory assistance to local directory assistance. Moreover, the provision of National Directory Assistance constitutes an in-region interLATA offering regardless of the presence of an interLATA transmission component.

Finally, none of the commenting local exchange carriers (“LECs”), including the BOCs, has explained why their use of the 411 access code for such an offering is not anticompetitive. The use of 411 is explicitly limited to local exchange services, and the LECs, in their comments and supporting arguments, provide more than adequate evidence to show why their exclusive use of 411 for National Directory Assistance is unreasonable and anticompetitive.

Accordingly, MCI files the following Reply Comments in the above-referenced proceeding.

I. The Statutory Definition Arguments

In their Comments, Bell Atlantic and Ameritech echo the statutory definition argument put forth by US West in its Petition, asserting that the definitions in the Communications Act, as amended, do not allow for National Directory Assistance to be characterized as an interLATA service.¹ In short, Ameritech and Bell Atlantic state that National Directory Assistance is not an interLATA service because neither “interLATA transmissions” nor “telecommunications” are involved in the provision of National Directory Assistance, and, therefore, they conclude that National Directory Assistance is not prohibited by any portion of the Act, including Section 271.

¹ See Bell Atlantic Comments (“Bell Atlantic”) at 2-3; see also Ameritech Comments (“Ameritech”) at 2-4.

As MCI explained in its initial Comments, however, National Directory Assistance is clearly an in-region service and is provided, at least by US West, by means of interLATA transmissions that occur as a result of the centralized provision of such services. In addition, Ameritech has admitted that its operators perform interLATA searches to retrieve National Directory Assistance listings.² Undoubtedly, these two offerings of National Directory Assistance are in-region, interLATA services under Section 271 of the Act.

More significantly, however, National Directory Assistance, regardless of the interLATA components contained in Ameritech's and US West's offerings, are properly characterized as "interLATA services" under the Act. As MCI explained in its Comments, the provision of interLATA services encompasses more than simply the carrying of interLATA transmissions; otherwise there would have been no need for the explicit authorization of BOC joint marketing and sale of local and interLATA services in Section 272(g)(3) of the Act to overcome the prohibition of such activities in Section 272(a)(2), which requires that certain types of "interLATA . . . services" be provided through a separate affiliate from the BOC's local services.³ The BOCs argue that the Act's definition of "interLATA services" renders the MFJ precedents cited by MCI inapplicable.⁴ Since the provision of "interLATA services" under the

² See Ameritech's July 14, 1997 letter in response to the Commission's request for more information regarding Ameritech's 1-800-AMERITECH and National Directory Assistance offerings. A copy of the letter is appended hereto as Exhibit A. In the attachment to its letter, labeled "National Directory Assistance Call Flow," at Step 7, Ameritech explains that its National Directory Assistance operators perform interLATA searches in providing the service.

³ See MCI Comments at 11-12.

⁴ See BellSouth Comments ("BellSouth") at 7; see also Bell Atlantic at 3; Ameritech at 3.

Act, however, is much broader than the BOCs recognize, and encompasses other activities necessary for the carrying of a call across LATA boundaries -- such as the marketing and sale of such services -- the BOCs' attempts to brush aside the MFJ precedents on the grounds that the MFJ's interexchange service prohibition was broader than the Act's definition of "interLATA services" fall flat. Thus, the BOCs have not demonstrated why the MFJ precedents that MCI cites do not offer useful guidance in interpreting Section 271's interLATA services restriction, which, like the MFJ's interexchange service ban, covers much more than the carriage of transmissions across LATA boundaries.⁵

Under the MFJ, activities that comprise the business of providing long distance service -- e.g., interLATA 800 directory assistance -- were considered interLATA telecommunications services, whether or not they involved interLATA transmissions,⁶ and the same should hold true in applying the restrictions in Section 271 on the provision of interLATA services. In the instance of National Directory Assistance, because interexchange carriers ("IXCs") provide long distance directory assistance and BOCs must provide the information that permits IXCs to provide long distance directory assistance, BOCs would be competing with IXCs for the provision of long distance directory assistance. Thus, any provision of the telephone numbers of subscribers in other LATAs constitutes an interLATA service under Section 271 of the Act.

⁵ Thus, Ameritech, for example, is incorrect when it states, in its Comments at 5, that there is no support for MCI's conclusion that, based on MFJ precedent, long distance directory assistance is an interLATA service. See MCI Comments at 7-10.

⁶ See U.S. v. Western Elec. Co., 627 F. Supp. at 1100, 1102, appeal dismissed, 797 F.2d 1082 (D.C. Cir. 1986) (stating that BOCs cannot engage "activities that comprise the business of providing interexchange services" -- that is, "the performance of functions that are normally and necessarily performed by those who are engaged in that business").

Indeed, the BOCs inadvertently reinforce this conclusion in correctly characterizing National Directory Assistance service as “adjunct-to-basic,”⁷ since its sole purpose is to enable subscribers to place calls. In particular, the purpose of National Directory Assistance is to enable callers to place interLATA calls, underscoring its interLATA nature. Moreover, if National Directory Assistance service is considered adjunct to basic, then it is a telecommunications service as that term is defined in Section 3(46) of the Act.⁸

BellSouth takes the adjunct-to-basic point too far, however, when it mischaracterizes MCI’s position on the legality of BOC provision of National Directory Assistance as entirely dependent on “the caller’s subsequent use of information obtained from [National Directory Assistance].”⁹ BellSouth argues that irrational results come from examining the nature of a call based on the caller’s subsequent actual use of the information received. That a caller using a BOC’s National Directory Assistance service *typically* uses such information to place interLATA calls is merely additional proof that the service is interLATA in nature. As the BOCs correctly point out, the characterization of directory assistance as adjunct-to-basic is based on the typical use of a number obtained from directory assistance -- namely, to place a call.¹⁰ That in a

⁷ See Ameritech at 6; see also Bell Atlantic at 4; see also BellSouth at 8-9; see also Roseville Telephone Company Comments (“Roseville”) at 6; see also Comments of Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell (“SWBT”) at 3.

⁸ See In the Matter of Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, As Amended, First Report and Order and Further Notice of Proposed Rulemaking, at para. 107, CC Docket No. 96-149, FCC 96-489, rel. December 24, 1996, (“Non-Accounting Safeguards Order”); on recon. 12 FCC Rcd. 2297 (1997); on further recon., Second Order on Reconsideration, FCC 97-222, rel. June 24, 1997.

⁹ See BellSouth at 5.

¹⁰ BellSouth at 8.

particular instance, a caller might not make a call to a number obtained from directory assistance makes no difference in categorizing directory assistance as adjunct to basic. Similarly, the actual use that a caller makes of a particular number obtained from National Directory Assistance should make no difference to its regulatory treatment. Contrary to BellSouth's complaint,¹¹ it is a simple matter to categorize a particular request for directory information as a local or interLATA directory call, based on the location of the caller and the number requested. BellSouth and the other BOCs have no trouble dividing their directory assistance services into local and national directory assistance on that basis.¹²

As if to reinforce MCI's point that National Directory Assistance is an interLATA service because the numbers obtained therefrom are used to place interLATA calls, BellSouth currently offers call completion in Kentucky through National Directory Assistance.¹³ These calls placed through the call completion service are certainly interLATA.

Ameritech and BellSouth also argue that National Directory Assistance is not an interLATA service because it does not involve transmissions or calls between points specified by the user. As Ameritech puts it, "[a] customer using [National Directory Assistance] does not specify that she wishes to contact an operator in any particular LATA."¹⁴ This argument makes

¹¹ BellSouth at 10.

¹² See US West Petition at 3 (describing the technical aspects of its National Directory Assistance service).

¹³ Since the proceedings in this matter began, MCI has learned that BellSouth's National Directory Assistance service offering in Kentucky contains automated announcements saying "at a charge of 30 cents you can be automatically connected to this party."

¹⁴ See Ameritech at 3; see also BellSouth at 7.

no sense, since users make calls all the time without knowing or caring where the recipient of the call is located. For example, consumers place 800 calls without knowing or caring about the location of the 800 service subscriber, but that does not exempt 800 service from Section 271's prohibitions. Similarly, National Directory Assistance involves calls placed to a National Directory Assistance operator to request a number in another LATA; that is all the caller needs to specify for National Directory Assistance to qualify as an interLATA service.

II. No Prior MFJ Authorization for the BOC Provision of National Directory Assistance

Given that National Directory Assistance is an in-region interLATA telecommunications service, the BOCs' only possible justification for providing the service at this time rests on their alternative claim under Section 271(f) of the Act that they have prior MFJ authorization to provide such service.

Ameritech, for example, argues that BOC provision of National Directory Assistance is permitted under Section 271(f) of the Act, which allows BOCs to provide services that were previously authorized under the MFJ. In making its argument, however, Ameritech goes on to reject the findings of the very MFJ decision it cites as authority for providing National Directory Assistance.¹⁵ On one hand, Ameritech embraces the MFJ and the MFJ Court's ruling on directory assistance as proof of authorization for BOC provision of National Directory Assistance, while, on the other hand, it rejects the determination in the same decision that

¹⁵ See Ameritech at 4-5.

National Directory Assistance is a long distance service.¹⁶ Ameritech cannot have it both ways.

The MFJ authorization to which Ameritech refers is limited in its scope. Contrary to the BOCs' arguments, the authorization in question permits them to provide only "exchange telecommunications and exchange access functions,"¹⁷ including directory assistance service,¹⁸ on a centralized -- and thus interLATA -- basis. Thus, the centralized provision of directory assistance authorized under the MFJ was directory assistance related to the BOCs' "exchange telecommunications" functions, or local directory assistance service. Accordingly, the provision of numbers of subscribers in other LATAs has not been previously authorized and is not within the exceptions allowed under Section 271(f) of the Act.

As MCI explained in its initial Comments,¹⁹ the MFJ, local directory assistance, dialed by 411, was considered a permissible "official service" that the BOCs could provide to their customers on a centralized, interLATA basis without a waiver.²⁰ In the case of directory assistance, however, the centralized provision of such services that was allowed did not enlarge the scope of the service that could be rendered; only the numbers of subscribers in the same LATA as the caller could be provided in response to a request for directory assistance, since only local directory assistance is within the "exchange telecommunications and exchange access

¹⁶ See United States v. Western Electric Co., 569 F. Supp. 1057, 1097-1102 (D.D.C. 1983).

¹⁷ See United States v. Western Electric Co., 569 F. Supp. 1057, 1100 (D.D.C. 1983).

¹⁸ Id. at 1098.

¹⁹ See MCI Comments at 8-10.

²⁰ See 569 F. Supp. at 1097, n. 175.

functions” authorized by the Court. Moreover, the Commission has explicitly stated that “Official Services” refer to “interLATA networks that are used to manage the operation of *local exchange services*” (emphasis added).²¹ The BOCs’ National Directory Assistance services do not relate to their operation of local exchange services; rather, National Directory Assistance is an adjunct to basic service only because it enables subscribers to make interLATA calls and thus relates to the provision of interLATA service, not local exchange service.

III. The Commission’s N11 Order with Respect to the 411 Access Code

As MCI explained in its initial Comments, in the First Report and Order in its docket captioned Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, FCC 97-51, at para. 47 (released February 19, 1997) (N11 Order), the Commission clearly concluded that 411 should only be used for “local directory assistance services.”²² The Commission was unequivocal that traditional directory assistance was limited to operator provision of local telephone numbers.²³ Accordingly, the BOCs’ and other LECs’ provision of telephone numbers, via 411, from distant LATAs violates the N11 Order’s determination of what constitutes a permissible use of a 411 number.

In its Comments, Ameritech misstates MCI’s position with regard to the appropriate and

²¹ See Non-Accounting Safeguards Order at n. 666.

²² See N11 Order at para. 47 (stating that “[l]ike 911 for access to emergency services, 411 has long been assigned for access to local directory assistance services . . . Accordingly, as we proposed in the N11 NPRM, we do not alter the assignment of the 411 code.”).

²³ Id., at para. 48, n. 170.

limited use of the 411 access code. Ameritech states that “classification of a particular service as enhanced or adjunct to basic based upon some ‘local’ character would lead to [absurd results].”²⁴ MCI is not arguing, as Ameritech suggests, that all adjunct to basic services are or should be local. In fact, whether or not a service is adjunct to basic has nothing to do with this 411 access issue, and MCI cannot fathom how Ameritech got onto this tangent. MCI’s point with regard to the use of 411 is simply that, according to the N11 Order, it is to be used only for local directory assistance services. Roseville, therefore, is incorrect in arguing that the N11 Order does not restrict the use of 411 to local directory assistance.²⁵

Some of the BOC commentators point out that Ameritech has sought reconsideration on the issue of whether 411 should be restricted to local directory assistance, arguing that the rationale of the N11 Order was simply to restrict 411 to basic services, rather than enhanced, and that the local or long distance nature of a directory assistance call has nothing to do with the basic/enhanced dichotomy.²⁶ It may be correct that the local or long distance nature of a call is irrelevant to the basic/enhanced distinction, but 411 should still be restricted to local directory assistance for similar competitive considerations. As MCI explained in its initial Comments, just as LECs may not use the 411 code for enhanced services unless they make that code available to other enhanced service providers, they should not be allowed to use it for interLATA services,

²⁴ See Ameritech at 6.

²⁵ See Roseville at 5 (referring to para. 48 of the N11 Order, which addresses BOC provision of enhanced services, while ignoring MCI’s reference to the language contained in the N11 Order at para. 47); see also *infra* n. 23 (quoting the N11 Order as it states that 411 should be “assigned for access to local directory assistance services”).

²⁶ See BellSouth at 10; see also Ameritech at 6; see also US West Petition at 15, n. 34.

such as the provision of long distance directory assistance, unless it is made available to other IXC's (and, of course, BOC's should not be allowed to use it for interLATA offerings until they obtain in-region interLATA authority). Further, unless and until the Commission's N11 Order is modified as Ameritech requested in its reconsideration petition, all LECs must comply with its requirements.

IV. The Unfair Competitive Advantage of the BOCs' Exclusive Use of 411

As MCI argued in its initial Comments, IXC's will be disadvantaged by the BOCs' exclusive use of 411 for services that compete with the IXC's.²⁷ In its Comments, BellSouth demonstrates the unfair competitive advantage LECs enjoy in offering National Directory Assistance through the 411 access code.²⁸ BellSouth explains that callers often do not know the area code for the number they are attempting to locate. By dialing 411 for National Directory Assistance, BellSouth argues, callers can obtain the appropriate area code information. The argument clearly demonstrates the competitive advantage BOCs have over IXC's in offering National Directory Assistance via 411.²⁹ Moreover, at the end of August 1997, Ameritech launched a series of radio advertisements touting the advantage it enjoys in its ability to offer National Directory Assistance via the 411 access code.³⁰ Accordingly, the BOCs' use of 411 for

²⁷ See MCI Comments at 14.

²⁸ See BellSouth at 5-6.

²⁹ See Roseville at 4 (making similar argument); see also Ameritech at 5.

³⁰ See attached Exhibit B, which is a transcript of the recent National Directory Assistance radio advertisement.

National Directory Assistance constitutes an unjust and unreasonable practice, in violation of Section 201(b) of the Act.

Although Roseville argues in its Comments that the LECs' use of 411 for National Directory Assistance is not an unreasonable practice within the meaning of Section 201(b) because there is no tie-in associated with the provision of National Directory Assistance,³¹ it is the LECs' exclusive and advantageous use of the 411 access code that violates Section 201(b) of the Act.

Further, Roseville argues that because it is not a BOC, it is not subject to the restrictions in Section 271 of Act. It is true that Roseville is not subject to the prohibitions imposed on BOCs by Section 271 of the Act; however, the character of National Directory Assistance does not hinge on the provider of such service. National Directory Assistance remains an in-region interLATA service where the callers who use such service are in-region; therefore, LECs, such as Roseville, must provide such services through a separate affiliate under the Competitive Carrier separation requirements.³²

CONCLUSION

As MCI has demonstrated, National Directory Assistance is an in-region interLATA

³¹ See Roseville at 3.

³² See In the Matter of Regulatory Treatment of LEC Provision of Interexchange Services Originating in the LEC's Local Exchange Area and Policy and Rules Concerning the Interstate, Interexchange Marketplace, CC Docket Nos. 96-149 and 96-61, Second Report and Order in CC Docket No. 96-149 and Third Report and Order in CC Docket No. 96-61, rel. April 18, 1997.

service, without regard to the technical configuration of the service. Although the commenting BOCs reject reliance on the MFJ precedents, all want to rely on an overly expansive reading of an MFJ Court order as authority to provide National Directory Assistance service. Such a reading is not possible, as the MFJ Court was clear in its limitations on the type and scope of directory assistance services BOCs were permitted to provide. Further, the use of 411 is explicitly limited to the provision of local exchange services. Accordingly, MCI urges the Commission to apply the statutory prohibitions against premature entry into in-region interLATA service under Section 271 of the Act and order the BOCs to cease the provision of National Directory Assistance and to order the LECs to provide such services through separate affiliates.

Respectfully submitted,
MCI TELECOMMUNICATIONS CORPORATION

By:



R. Dale Dixon, Jr.

Frank W. Krogh

Lisa B. Smith

1801 Pennsylvania Avenue, NW

Washington, D.C. 20554

202-887-2383

Its Attorneys

Date: September 17, 1997

EXHIBIT A



Frank Michael Panek
Counsel

July 14, 1997

VIA FACSIMILE (202-418-0236) AND OVERNIGHT DELIVERY

Diane Griffin Harmon, Esq.
Staff Attorney
Federal Communications Commission
Room 6312B
2025 M. Street, N.W.
Washington, DC 20554

Re: MCI Telecommunications Corp. V. Illinois Bell, et al.;
File Number E-97-19

Dear Ms. Griffin Harmon:

As directed in your letter of July 11 and discussed during this afternoon's status conference, attached are call-flow narratives for Ameritech's 1-800-AMERITECH and National Directory Assistance offerings. These materials are written versions of Jon Sonnenschein's earlier verbal descriptions explaining in a step-by-step fashion how customers use these offerings. As requested, they are annotated (in italics) with "scripts" of the branding and other messages heard by customers during actual calls. For your convenience, minor additions also document our verbal answers to several questions which arose during today's status conference. Copies of radio, television and print media promotional materials regarding the 1-800-AMERITECH offering are also provided herewith.

This documentation from today's status conference is a purely factual supplement to the record, and does not present any new materials of a character that should require either further factual development or additional legal argument. As I noted earlier today, it is Ameritech's continued hope that the parties can avoid expanding the issues or reopening discovery at such a late date. To that end, the procedural schedule and structure set forth at the outset of this proceeding (in Mr. Reynolds' letter of May 23) admonished the parties that "(a)bsent a showing of extraordinary need, no extensions will be granted and no additional discovery will be allowed." Nonetheless, should counsel for

MCI elect to submit additional factual materials or legal argument regarding the attached documentation of today's status conference. Ameritech respectfully reserves its right to respond fully in kind to any such argument or materials. Both the Commission's rules (see, e.g, 47 CFR § 1.732[g]) and basic notions of due process require no less.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank W. Krogh". The signature is written in a cursive, slightly stylized font.

attachments

cc: R. Dale Dixon, Esq.
Frank W. Krogh, Esq.
Lisa B. Smith, Esq.
Counsel for MCI Telecommunications Corp.
ITS (paper attachments only)

1-800-AMERITECH Call Flow

To illustrate the flow of an in region interLATA call, I will describe a hypothetical call from Chicago to Detroit.

- Step 1. The customer dials 1-800-AMERITECH.
- Step 2. Ameritech routes the call to the Access Tandem switch in the same LATA as the caller, as it does for any other call to an 800-number.
- Step 3. At the switch, Ameritech searches the national 800-number data base to determine who carries the dialed number. The data base responds that 1-800-AMERITECH is WilTel's number.
- Step 4. Ameritech routes the call to WilTel's closest Point of Presence switch, as it does for any other WilTel 800-number call.
- Step 5. From its switch, WilTel routes the call over its network to its Point of Presence closest to the company providing wholesale operator services.
- Step 6. WilTel routes the call from its switch to the wholesale operator services provider's switch.
- Step 7. The wholesale operator services provider prompts the customer for the number they are calling and their calling card number and PIN.
***["Welcome to 800-AMERITECH."]
["To place a calling card call, dial the area code and seven-digit phone number you wish to reach now.
Or, to place an international call, dial 0 now."]
["To use your calling card, please enter the calling card number and PIN now.]***
- Step 8. The customer enters this information or requests operator assistance.
- Step 9. The wholesale operator services provider checks the calling card number and PIN in its data base.
- Step 10. If the card is valid, the wholesale operator services provider passes the call back to the WilTel Point of Presence described in Step 5.
["Thank you for using 800-AMERITECH."]
- Step 11. WilTel routes the call over its network to its Point of Presence closest to the called number.
- Step 12. WilTel passes the call to the Ameritech Access Tandem switch closest to the called number.
- Step 13. Ameritech routes the call to the called number, as it does for any other long distance carrier's call.
["RING"]

In summary, the call is handled in the same way as a 1-800-COLLECT call. The only difference is that WilTel carries the call instead of MCI.

National Directory Assistance Call Flow

To illustrate the flow of a National Directory Assistance call, I will describe a hypothetical call in Chicago.

- Step 1. The customer dials 411.
- Step 2. Ameritech routes the call to the Operator Services switch in the same LATA as the customer, as it does for any other Operator Services or Directory Assistance call.
- Step 3. At the switch, Ameritech determines that the customer requested Directory Assistance service and brands the call. All Ameritech Directory Assistance and Operator Services are provided from the same switches in the same LATA as the calling customers.
["Ameritech National Directory Assistance."]
- Step 4. The Operator Services switch reaches out for a Directory Assistance Operator in the same LATA as the customer.
- Step 5. The Operator asks the customer for the City and State of the desired listing and the listed name.
["Operator. City and State?"]
- Step 6. The customer requests the listing from the Operator.
- Step 7. The Operator launches a search to the data base in Milwaukee, Wisconsin or Troy, Michigan. For network efficiency purposes, these same data bases are used for both local and national directory assistance.
- Step 8. The Operator finds the desired listing in the data base.
- Step 9. The Operator sends the data to an audio response unit colocated with the operator services switch in the same LATA as the customer.
- Step 10. The Operator drops off the call and connects the audio response unit at the switch to the customer.
- Step 11. The audio response unit at the switch reads the listing to the customer in the same LATA.
["Thank you for calling. The number is area code NPA, NXX-XXXX. Area code NPA, NXX-XXXX. If you need assistance, please say 'yes' now."]
- Step 12. The customer hangs up.

In summary, except for the location of the listing requested by the customer, national directory assistance is handled the same way as local directory assistance.

Ameritech has made national directory assistance available for resale to Competitive LECs (CLECs). Ameritech will brand each CLEC's calls appropriately (e.g., MCI Metro). Ameritech makes the same data available to CLECs as it does to its own customers.

EXHIBIT B



VIDEO MONITORING
SERVICES
OF AMERICA, L.P.

330 West 42nd Street, New York, NY 10036
(212) 736-2010 / Fax: (212) 736-8396
6430 West Sunset Blvd., Los Angeles, CA 90028
(213) 993-0111 / Fax: (213) 467-7540
212 West Superior Street, Chicago, IL 60610
(312) 649-1131 / Fax: (312) 649-1527
1930 Chestnut Street, Philadelphia, PA 19103
(215) 569-4990 / Fax: (212) 563-1985
730 Harrison Street, San Francisco, CA 94107
(415) 543-3361 / Fax: (415) 543-6148

26400 Lahser Road, Suite 312, Southfield, MI 48034
(810) 352-9220 / Fax: (810) 352-9226
361 Newbury Street, Boston, MA 02115
(617) 266-2121 / Fax: (617) 266-1301
8111 LBJ Freeway, Dallas, TX 75251
(214) 644-9696 / Fax: (214) 644-7055
1066 National Press Building, Washington, DC 20045
(202) 393-7110 / Fax: (202) 393-5451
10260 Westheimer, Suite 210, Houston, TX 77042
(713) 789-1635 / Fax: (713) 789-0980

2125 Biscayne Boulevard, Miami, FL 33137
(305) 576-3581 / Fax: (305) 576-3049
One Broadway, Suite A210, Denver, CO 80203
(303) 733-8000 / Fax: (303) 733-8080
67 Prospect Avenue, Hartford, CT 06106
(860) 236-6662 / Fax: (860) 236-2481
1951 Fourth Avenue, San Diego, CA 92101
(619) 544-1860 / Fax: (619) 544-0230

TRANSCRIPT

DATE: AUGUST 25, 1997
TIME: 6:22AM
STATION: WAMQ-AM
LOCATION: CHICAGO
PRODUCT: AMERITECH 411
LENGTH: :60
CODE: 9708-5210LS

TITLE: BAD HABITS GROUP

(SFX: CROWD CHEERING AND APPLAUDING)

WOMAN: Alright! How we doing?

PEOPLE: Alright!

WOMAN: So tell me, do we have bad habits?

PEOPLE: Yes!

WOMAN: Can we change them?

PEOPLE: Yes!

WOMAN: Today we're going to change a bad habit into a good habit with 411 from Ameritech.

PEOPLE: Ooooooh!

WOMAN: Now with your source for local and long distance information.

PEOPLE: Let's do it!

WOMAN: Okay! When you want to make a call and you don't know the area code or the phone number, what do you do?

(SFX: CROWD IS CONFUSED)

WOMAN: First you turn your life upside down looking for an area code. That's a bad habit. Say it.

PEOPLE: Bad habit.

WOMAN: Then after that you have to dial 1 plus the area code plus 555-1212. Sounds like a--

PEOPLE: Bad habit.

WOMAN: But you can change that bad habit when you dial 411. Now you don't need to know the area code to get a phone number anywhere in the USA.

PEOPLE: Ooooooh!



VIDEO MONITORING
SERVICES
OF AMERICA, L.P.

330 West 42nd Street, New York, NY 10036
(212) 736-2010 / Fax: (212) 736-8396
6430 West Sunset Blvd., Los Angeles, CA 90028
(213) 993-0111 / Fax: (213) 467-7540
212 West Superior Street, Chicago, IL 60610
(312) 649-1131 / Fax: (312) 649-1527
1930 Chestnut Street, Philadelphia, PA 19103
(215) 569-4990 / Fax: (212) 563-1985
730 Harrison Street, San Francisco, CA 94107
(415) 543-3361 / Fax: (415) 543-6148

26400 Lahser Road, Suite 312, Southfield, MI 48034
(810) 352-9220 / Fax: (810) 352-9226
361 Newbury Street, Boston, MA 02115
(617) 266-2121 / Fax: (617) 266-1301
8111 LBJ Freeway, Dallas, TX 75251
(214) 644-9696 / Fax: (214) 644-7055
1066 National Press Building, Washington, DC 20045
(202) 393-7110 / Fax: (202) 393-5451
10260 Westheimer, Suite 210, Houston, TX 77042
(713) 789-1635 / Fax: (713) 789-0980

2125 Biscayne Boulevard, Miami, FL 33137
(305) 576-3581 / Fax: (305) 576-3049
One Broadway, Suite A210, Denver, CO 80203
(303) 733-8000 / Fax: (303) 733-8080
67 Prospect Avenue, Hartford, CT 06106
(860) 236-6662 / Fax: (860) 236-2481
1951 Fourth Avenue, San Diego, CA 92101
(619) 544-1860 / Fax: (619) 544-0230

TRANSCRIPT

PAGE 2

AMERITECH 411

9708-5210

WOMAN: 411 from Ameritech is what I call a--

WOMAN AND PEOPLE: Good habit!

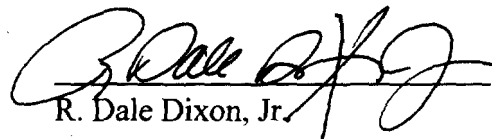
WOMAN: I think I need to hug somebody.

(SFX: PEOPLE CHEERING FADES AWAY)

###

CERTIFICATE OF SERVICE

I, R. Dale Dixon, Jr., hereby certify that a true copy of the foregoing "REPLY
COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION" was served this 17th
day of September, 1997, by either hand delivery or first-class mail, postage prepaid, upon each of
the persons on the attached service list:


R. Dale Dixon, Jr.

Janice Myles*
Common Carrier Bureau
Federal Communications Commission
Room 544
1919 M Street, NW
Washington, D.C. 20554

Frank Michael Panek
Attorney for Ameritech
Room 4H84
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

George Petrutsas
Paul J. Feldman
Attorneys for Roseville Telephone Company
Fletcher, Heald & Hildreth, PLC
11th Floor, 1300 North 17th Street
Rosslyn, VA 22209

M. Robert Sutherland
Theodore R. Kingsley
Attorneys for BellSouth Corporation
Suite 1700
1155 Peachtree Street, NE
Atlanta, GA 30309-3610

Robert B. McKenna
Richard A. Karre
Attorneys for US West Communications, Inc.
Suite 700
1020 19th Street, NW
Washington, D.C. 20036

Robert A. Shives
Attorney for Pacific Bell
Room 2W803
2600 Camino Ramon
San Ramon, CA 94583

Mark C. Rosenblum
Ava B. Kleinman
James H. Bolin, Jr.
Attorneys for AT&T
Room 3252J1
295 North Maple Avenue
Basking Ridge, NJ 07920

April Rodewald
Attorney for Nevada Bell
P.O. Box 11017
645 E. Plum Lane
Reno, NV 89520

John M. Goodman
Edward D. Young, III
Michael E. Glover
Attorneys for Bell Atlantic
1300 I Street, NW
Washington, D.C. 20005

Robert M. Lynch
Durward D. Dupre
Mary W. Marks
Marjorie Morris Weisman
Attorneys for Southwestern Bell Telephone
Company
Room 3520, One Bell Center
St. Louis, MO 63101

ITS*
Room 246
1919 M Street, NW
Washington, D.C. 20554

* Hand Delivery